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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION**

**CASCADIA WILDLANDS, OREGON
WILD, UMPQUA WATERSHEDS,**

Plaintiffs,

v.

**U.S. BUREAU OF
LAND MANAGEMENT,**

Defendant

and

**AMERICAN FOREST RESOURCE
COUNCIL; ASSOCIATION OF O&C
COUNTIES,**

Defendant-Intervenors.

Case No. 6:24-cv-01641-MTK

**JOINT STATUS REPORT AND
STIPULATION REGARDING TIMBER
SALES**

On January 16, 2025, the Court held a Rule 16 status conference in this matter. Following the conference, the Court entered a Scheduling Order (Dkt #18) setting deadlines for the filing of the administrative record, and the filing of briefs on cross-motions for summary judgment. The order also provided that oral argument on the cross-motions “will potentially take place on 10/9/2025 at 9:30am, pending the Judge's availability. If oral argument does not take place on 10/9/2025, it will take place on 11/13/2025 at 9:30am.” Dkt. #18.

On February 14, 2025, counsel for Defendant-Intervenors provided notice that ground-disturbing activities will begin in the project area in 30 days. Counsel for all Parties have now conferred and have reached agreement that is intended to avoid the need for Plaintiffs to seek preliminary injunctive relief to halt the activities in the project area. Now therefore, the Parties hereby stipulate and request that the Court enter an order as follows:

1. Until the completion of summary judgment briefing and oral argument as set forth in the Scheduling Order (Dkt #18), no ground-disturbing activities connected with or authorized by the Blue and Gold Project will occur, with the exception of the previously awarded Tidy Bowl and Galagher Canyon sales, and the forthcoming Yellow Panther sale, now scheduled for auction on April 22, 2025. The parties agree that the Purchasers of these three sales do not need to comply with any 30-day notice provision or requirement.
2. The forthcoming Yellow Panther sale will be limited to 49 acres contained within: T.23 S., R. 5 W., Sections 17, 19; and described in the Environmental Assessment as Units 23-5-17A and 23-5-19D.
3. Federal Defendants may auction additional sales in the interim but will not award additional contracts, other than those three described in paragraph 1, until summary judgment briefing and oral argument are complete as set forth in Dkt. #18 .

4. Plaintiffs reserve the right to seek relief should sales and implementation identified in paragraphs 1 and 2 deviate from what has been described in planning documents and represented by counsel for Defendants and Defendant-Intervenors, as outlined here.
5. The Parties will otherwise conform to the schedule for summary judgment briefing set by the Court in the Scheduling Order. See Dkt. 18.
6. The Parties further agree to work in good faith to timely resolve any administrative record issues and brief any motions regarding the same prior to or contemporaneously with the summary judgment briefing schedule set forth in the Court's Scheduling Order (Dkt. #18).

IT IS SO STIPULATED.

DATE February 26, 2025

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